



Oregon

John A. Kitzhaber, MD, Governor

Public Utility Commission

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May 22, 2012

Ms. Sharon Gillett
Chief, Wireline Competition Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: WC Docket Nos. 10-90, 07-135, 05-337, 03-109; CC Docket Nos. 01-92, 96-45;
GN Docket No. 09-51, Eagle Telephone Systems, d/b/a Snake River PCS,
Application for Review

Dear Ms. Gillett:

Snake River PCS, with another carrier, has filed the above-referenced application. I am writing to you in support of Eagle Telephone Systems, d/b/a Snake River PCS ("Snake River PCS").

The Staff of the OPUC has been impressed with the responsiveness and responsibility demonstrated by Snake River PCS. Snake River PCS has a history of using support from the federal universal service fund to build new cell sites in unserved and under-served areas. Snake River PCS has established a program using federal universal service funds to responsibly improve service for customers in a very challenging area to provide service.

I want to underscore that the area that Snake River PCS serves is very remote and rugged. It is a very high-cost area which is very difficult to serve. The area includes the Wallowa Mountains, the Wallowa-Whitman National Forest and the Hell's Canyon National Recreation Area of the Snake River.

Because this area is mountainous and the population density is quite sparse, the area lacks seamless wireless services. The wireless services that are available are not comparable to wireless services in urban areas. The service is not nearly as ubiquitous as one would desire. This is despite Snake River PCS' efforts to date. Those efforts have improved service, but there are still many residences and road miles that lack reliable mobile coverage in that challenging area.

This means that continued expansion of wireless service is needed in the area. In addition to working to improve coverage, Snake River PCS has informed us of their intent to deploy 4G services. The expansion of wireless service and introduction of mobile broadband

would help with the area's economic competitiveness. The expansion of wireless service will also benefit public health and safety. While the new support mechanisms, such as the Phase I Mobility Auction, may offer some support for rural wireless carriers in Oregon in attempting to overlay 3G and 4G services on existing networks, I am concerned that the auction may not be able to reach such remote and high cost areas that lack even the basic tower infrastructure to provide voice services, as is the case in much of Northeastern Oregon. Thus, I support the applicant's goal of obtaining a modest increase in legacy federal support for Snake River, which can be used to extend the reach of the existing voice network and provide a foundation for future mobile broadband services.

It is also helpful for you to know that Snake River PCS is a locally-owned, locally-managed and locally-operated company. It is a family-owned business with long standing roots in the communities in northeastern Oregon.

Whatever the merits of Snake River PCS' arguments may be before the FCC, I think it is important for you to be aware of the contributions that Snake River PCS has made to providing service in a very difficult, very remote area in northeast Oregon and in providing improved service to customers in northeast Oregon. If additional funds could be made available pursuant to the application consistent with the FCC's ICC/USF Transformation Order, I am confident that Snake River PCS will continue to responsibly improve service for customers in a very challenging area to provide service.

Sincerely,

A handwritten signature in black ink, appearing to read "Bryan Conway", with a long horizontal flourish extending to the right.

Bryan Conway
Administrator, Telecommunications